



**Minnesota Pollution
Control Agency**

520 Lafayette Road North
St. Paul, MN 55155-4194

MS4 SWPPP Application for Reauthorization

**for the NPDES/SDS General Small Municipal Separate
Storm Sewer System (MS4) Permit MNR040000
reissued with an effective date of August 1, 2013**
Stormwater Pollution Prevention Program (SWPPP) Document

Doc Type: Permit Application

Instructions: This application is for authorization to discharge stormwater associated with Municipal Separate Storm Sewer Systems (MS4s) under the National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS) Permit Program. **No fee** is required with the submittal of this application. Please refer to "Example" for detailed instructions found on the Minnesota Pollution Control Agency (MPCA) MS4 website at <http://www.pca.state.mn.us/ms4>.

Submittal: This MS4 SWPPP Application for Reauthorization form must be submitted electronically via e-mail to the MPCA at ms4permitprogram.pca@state.mn.us from the person that is duly authorized to certify this form. All questions with an asterisk (*) are required fields. All applications will be returned if required fields are not completed.

Questions: Contact Claudia Hochstein at 651-757-2881 or claudia.hochstein@state.mn.us, Dan Miller at 651-757-2246 or daniel.miller@state.mn.us, or call toll-free at 800-657-3864.

General Contact Information (*Required fields)

MS4 Owner (with ownership or operational responsibility, or control of the MS4)

*MS4 permittee name: City of Baxter *County: Crow Wing
(city, county, municipality, government agency or other entity)

*Mailing address: P.O. Box 2626

*City: Baxter *State: MN *Zip code: 56425

*Phone (including area code): (218) 454-5115 *E-mail: publicworks@baxtermn.gov

MS4 General contact (with Stormwater Pollution Prevention Program [SWPPP] implementation responsibility)

*Last name: Walter *First name: Trevor
(department head, MS4 coordinator, consultant, etc.)

*Title: Public Works Director/City Engineer

*Mailing address: 13190 Memorywood Dr

*City: Baxter *State: MN *Zip code: 56425

*Phone (including area code): (218) 454-5115 *E-mail: publicworks@baxtermn.gov

Preparer information (complete if SWPPP application is prepared by a party other than MS4 General contact)

Last name: Walter First name: Trevor
(department head, MS4 coordinator, consultant, etc.)

Title: Public Works Director/City Engineer

Mailing address: P.O. Box 2626

City: Baxter State: MN Zip code: 56425

Phone (including area code): (218) 454-5115 E-mail: publicworks@baxtermn.gov

Verification

1. I seek to continue discharging stormwater associated with a small MS4 after the effective date of this Permit, and shall submit this MS4 SWPPP Application for Reauthorization form, in accordance with the schedule in Appendix A, Table 1, with the SWPPP document completed in accordance with the Permit (Part II.D.). ☒ Yes
2. I have read and understand the NPDES/SDS MS4 General Permit and certify that we intend to comply with all requirements of the Permit. ☒ Yes

Certification (All fields are required)

- ☒ Yes - I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted.

I certify that based on my inquiry of the person, or persons, who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

I am aware that there are significant penalties for submitting false information, including the possibility of civil and criminal penalties.

This certification is required by Minn. Stat. §§ 7001.0070 and 7001.0540. The authorized person with overall, MS4 legal responsibility must certify the application (principal executive officer or a ranking elected official).

By typing my name in the following box, I certify the above statements to be true and correct, to the best of my knowledge, and that this information can be used for the purpose of processing my application.

Name: Trevor Walter

(This document has been electronically signed)

Title: Public Works Director/City Engineer Date (mm/dd/yyyy): 11/27/2013

Mailing address: 13190 Memorywood Dr

City: Baxter State: MN Zip code: 56425

Phone (including area code): (218)-454-5115 E-mail: publicworks@baxtermn.gov

Note: The application will not be processed without certification.

Stormwater Pollution Prevention Program Document

I. Partnerships: (Part II.D.1)

- A. List the **regulated small MS4(s)** with which you have established a partnership in order to satisfy one or more requirements of this Permit. Indicate which Minimum Control Measure (MCM) requirements or other program components that each partnership helps to accomplish (List all that apply). Check the box below if you currently have no established partnerships with other regulated MS4s. If you have more than five partnerships, hit the tab key after the last line to generate a new row.

☒ No partnerships with regulated small MS4s

Name and description of partnership	MCM/Other permit requirements involved

- B. If you have additional information that you would like to communicate about your partnerships with other regulated small MS4(s), provide it in the space below, or include an attachment to the SWPPP Document, with the following file naming convention: *MS4NameHere_Partnerships*.

II. Description of Regulatory Mechanisms: (Part II.D.2)

Illicit discharges

- A. Do you have a regulatory mechanism(s) that effectively prohibits non-stormwater discharges into your small MS4, except those non-stormwater discharges authorized under the Permit (Part III.D.3.b.)? ☒ Yes ☐ No

1. If yes:

- a. Check which *type* of regulatory mechanism(s) your organization has (check all that apply):

☒ Ordinance ☐ Contract language
☐ Policy/Standards ☐ Permits
☐ Rules
☐ Other, explain: _____

- b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

Citation:

City of Baxter Ordinance No. 2008-11: Section 8-5-11 - ILLICIT DISCHARGE PROHIBITION;

Part B.1. - Prohibition of Illegal Discharges: No Person Shall discharge or cause to be discharged into the municipal drain system or watercourses any materials, including but not limited to pollutants or waters containing any pollutants that cause or contribute to a violation of applicable water quality standards, other than storm water.

Direct link:

http://www.sterlingcodifiers.com/codebook/index.php?book_id=529

☐ Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere_IDDEreg*.

2. If no:

Describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

Construction site stormwater runoff control

- A. Do you have a regulatory mechanism(s) that establishes requirements for erosion and sediment controls and waste controls? ☒ Yes ☐ No

1. If **yes**:

- a. Check which *type* of regulatory mechanism(s) your organization has (check all that apply):

- ☒ Ordinance ☐ Contract language
☐ Policy/Standards ☐ Permits
☐ Rules
☐ Other, explain: _____

- b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

Citation:

City of Baxter Ordinance No. 2008-11: Section 8-5-4 - GRADING PERMIT AND STORMWATER AND POLLUTION PREVENTION PLAN ("SWPPP"); Part D. - Minimum Standards for the Storm Water Pollution Prevention Plan. The minimum standards for guiding the design, implementation, and regulation of the SWPPP are found in the MPCA NPDES Construction Permit (MN R100001) and Minnesota State Rule 7090.2000 to 7090.2060.

Direct link:

http://www.sterlingcodifiers.com/codebook/index.php?book_id=529

- ☐ Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere_CSWreg*.

- B. Is your regulatory mechanism at least as stringent as the MPCA general permit to Discharge Stormwater Associated with Construction Activity (as of the effective date of the MS4 Permit)? ☒ Yes ☐ No

If you answered **yes** to the above question, proceed to C.

If you answered **no** to either of the above permit requirements listed in A. or B., describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

- C. Answer **yes** or **no** to indicate whether your regulatory mechanism(s) requires owners and operators of construction activity to develop site plans that incorporate the following erosion and sediment controls and waste controls as described in the Permit (Part III.D.4.a.(1)-(8)), and as listed below:

- | | |
|--|---|
| 1. Best Management Practices (BMPs) to minimize erosion. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 2. BMPs to minimize the discharge of sediment and other pollutants. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 3. BMPs for dewatering activities. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 4. Site inspections and records of rainfall events | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 5. BMP maintenance | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 6. Management of solid and hazardous wastes on each project site. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 7. Final stabilization upon the completion of construction activity, including the use of perennial vegetative cover on all exposed soils or other equivalent means. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 8. Criteria for the use of temporary sediment basins. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

Post-construction stormwater management

- A. Do you have a regulatory mechanism(s) to address post-construction stormwater management activities?

☒ Yes ☐ No

1. If **yes**:

- a. Check which type of regulatory mechanism(s) your organization has (check all that apply):

☒ Ordinance ☐ Contract language
☐ Policy/Standards ☐ Permits
☐ Rules
☐ Other, explain: _____

- b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

Citation:

City of Baxter Ordinance No. 2008-11: Section 8-5-4.G.2.a. - All storm water pollution control management facilities must be designed to minimize the need of maintenance, to provide easy vehicle and personnel access for maintenance purposes and be structurally sound. These facilities must have a plan of operation and maintenance that ensures continued effective removal of the pollutants carried in storm water runoff. The operation and maintenance plan shall be in writing and signed by the owner. A copy of the signed agreement shall be filed at City Hall and with the project files. The city's designated representative shall inspect all storm water management facilities during construction, during the first year of operation, and annually thereafter. The city will keep all inspection records on file for a period of 5 years.

Direct link:

http://www.sterlingcodifiers.com/codebook/index.php?book_id=529

☐ Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere_PostCSWreg*.

- B. Answer **yes** or **no** below to indicate whether you have a regulatory mechanism(s) in place that meets the following requirements as described in the Permit (Part III.D.5.a.):

1. **Site plan review:** Requirements that owners and/or operators of construction activity submit site plans with post-construction stormwater management BMPs to the permittee for review and approval, prior to start of construction activity. ☒ Yes ☐ No
2. **Conditions for post construction stormwater management:** Requires the use of any combination of BMPs, with highest preference given to Green Infrastructure techniques and practices (e.g., infiltration, evapotranspiration, reuse/harvesting, conservation design, urban forestry, green roofs, etc.), necessary to meet the following conditions on the site of a construction activity to the Maximum Extent Practicable (MEP):
 - a. For new development projects – no net increase from pre-project conditions (on an annual average basis) of: ☐ Yes ☒ No
 - 1) Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)).
 - 2) Stormwater discharges of Total Suspended Solids (TSS).
 - 3) Stormwater discharges of Total Phosphorus (TP).
 - b. For redevelopment projects – a net reduction from pre-project conditions (on an annual average basis) of: ☐ Yes ☒ No
 - 1) Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)).
 - 2) Stormwater discharges of TSS.
 - 3) Stormwater discharges of TP.
3. **Stormwater management limitations and exceptions:**
 - a. Limitations
 - 1) Prohibit the use of infiltration techniques to achieve the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)) when the infiltration structural stormwater BMP will receive discharges from, or be constructed in areas: ☒ Yes ☐ No
 - a) Where industrial facilities are not authorized to infiltrate industrial stormwater under an NPDES/SDS Industrial Stormwater Permit issued by the MPCA.
 - b) Where vehicle fueling and maintenance occur.
 - c) With less than three (3) feet of separation distance from the bottom of the infiltration system to the elevation of the seasonally saturated soils or the top of bedrock.
 - d) Where high levels of contaminants in soil or groundwater will be mobilized by the infiltrating stormwater.
 - 2) Restrict the use of infiltration techniques to achieve the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), without higher engineering review, sufficient to provide a functioning treatment system and prevent adverse ☒ Yes ☐ No

- impacts to groundwater, when the infiltration device will be constructed in areas:
- With predominately Hydrologic Soil Group D (clay) soils.
 - Within 1,000 feet up-gradient, or 100 feet down-gradient of active karst features.
 - Within a Drinking Water Supply Management Area (DWSMA) as defined in Minn. R. 4720.5100, subp. 13.
 - Where soil infiltration rates are more than 8.3 inches per hour.

- 3) For linear projects where the lack of right-of-way precludes the installation of volume control practices that meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), the permittee's regulatory mechanism(s) may allow exceptions as described in the Permit (Part III.D.5.a(3)(b)). The permittee's regulatory mechanism(s) shall ensure that a reasonable attempt be made to obtain right-of-way during the project planning process. ☒ Yes ☐ No

4. **Mitigation provisions:** The permittee's regulatory mechanism(s) shall ensure that any stormwater discharges of TSS and/or TP not addressed on the site of the original construction activity are addressed through mitigation and, at a minimum, shall ensure the following requirements are met:

- Mitigation project areas are selected in the following order of preference: ☐ Yes ☒ No
 - Locations that yield benefits to the same receiving water that receives runoff from the original construction activity.
 - Locations within the same Minnesota Department of Natural Resource (DNR) catchment area as the original construction activity.
 - Locations in the next adjacent DNR catchment area up-stream
 - Locations anywhere within the permittee's jurisdiction.
- Mitigation projects must involve the creation of new structural stormwater BMPs or the retrofit of existing structural stormwater BMPs, or the use of a properly designed regional structural stormwater BMP. ☐ Yes ☒ No
- Routine maintenance of structural stormwater BMPs already required by this permit cannot be used to meet mitigation requirements of this part. ☐ Yes ☒ No
- Mitigation projects shall be completed within 24 months after the start of the original construction activity. ☐ Yes ☒ No
- The permittee shall determine, and document, who will be responsible for long-term maintenance on all mitigation projects of this part. ☐ Yes ☒ No
- If the permittee receives payment from the owner and/or operator of a construction activity for mitigation purposes in lieu of the owner or operator of that construction activity meeting the conditions for post-construction stormwater management in Part III.D.5.a(2), the permittee shall apply any such payment received to a public stormwater project, and all projects must be in compliance with Part III.D.5.a(4)(a)-(e). ☐ Yes ☒ No

5. **Long-term maintenance of structural stormwater BMPs:** The permittee's regulatory mechanism(s) shall provide for the establishment of legal mechanisms between the permittee and owners or operators responsible for the long-term maintenance of structural stormwater BMPs not owned or operated by the permittee, that have been implemented to meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)). This only includes structural stormwater BMPs constructed after the effective date of this permit and that are directly connected to the permittee's MS4, and that are in the permittee's jurisdiction. The legal mechanism shall include provisions that, at a minimum:

- Allow the permittee to conduct inspections of structural stormwater BMPs not owned or operated by the permittee, perform necessary maintenance, and assess costs for those structural stormwater BMPs when the permittee determines that the owner and/or operator of that structural stormwater BMP has not conducted maintenance. ☐ Yes ☒ No
- Include conditions that are designed to preserve the permittee's right to ensure maintenance responsibility, for structural stormwater BMPs not owned or operated by the permittee, when those responsibilities are legally transferred to another party. ☐ Yes ☒ No
- Include conditions that are designed to protect/preserve structural stormwater BMPs and site features that are implemented to comply with the Permit (Part III.D.5.a(2)). If site configurations or structural stormwater BMPs change, causing decreased structural stormwater BMP effectiveness, new or improved structural stormwater BMPs must be implemented to ensure the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)) continue to be met. ☐ Yes ☒ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within twelve (12) months of the date permit coverage is extended, these permit requirements are met:

B.2.a., B.2.b, B.4.a., B.4.b., B.4.c., B.4.d., B.4.e., B.4.f, B.5.a., B.5.b., B.5.c : The City will draft new sections for its Stormwater Ordinance and edit existing sections as needed to include all requirements for the new permit. During the drafting stages, the ordinance will be reviewed by the City's attorney. The new ordinance will be presented to the appropriate commissions/council for consideration. And a public hearing will be conducted before the ordinance can be passed and added to City Code.

III. Enforcement Response Procedures (ERPs): (Part II.D.3)

A. Do you have existing ERPs that satisfy the requirements of the Permit (Part III.B.)? ☐ Yes ☒ No

1. If **yes**, attach them to this form as an electronic document, with the following file naming convention: *MS4NameHere_ERPs*.
2. If **no**, describe the tasks and corresponding schedules that will be taken to assure that, with twelve (12) months of the date permit coverage is extended, these permit requirements are met:

The City of Baxter is a member of the Minnesota Cities Stormwater Coalition and will use it as a resource in developing Enforcement Response Procedures (ERPs). The ERPs will be developed and implemented within the first 12 months of extended coverage.

B. Describe your ERPs:

IV. Storm Sewer System Map and Inventory: (Part II.D.4.)

A. Describe how you manage your storm sewer system map and inventory:

The City of Baxter uses GIS to inventory all of its stormwater infrastructure including all conveyances (12" in dia. or larger), ponds, structural BMPs, .

B. Answer **yes** or **no** to indicate whether your storm sewer system map addresses the following requirements from the Permit (Part III.C.1.a-d), as listed below:

1. The permittee's entire small MS4 as a goal, but at a minimum, all pipes 12 inches or greater in diameter, including stormwater flow direction in those pipes. ☐ Yes ☒ No
2. Outfalls, including a unique identification (ID) number assigned by the permittee, and an associated geographic coordinate. ☐ Yes ☒ No
3. Structural stormwater BMPs that are part of the permittee's small MS4. ☒ Yes ☐ No
4. All receiving waters. ☒ Yes ☐ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

B.1: The City of Baxter's storm sewer system map development is ongoing. It will be further developed to satisfy all requirements of the new permit, including all pipes 12 inches or larger and flow direction in those pipes, and to include newly constructed pipes in the future. This task will be ongoing for the entire permit term.

B.2: The City will update its BMP inventory with unique identification numbers and associated geographic coordinates. This will done within 12 months of extended coverage.

C. Answer **yes** or **no** to indicate whether you have completed the requirements of 2009 Minnesota Session Law, Ch. 172. Sec. 28: with the following inventories, according to the specifications of the Permit (Part III.C.2.a.-b.), including:

1. All ponds within the permittee's jurisdiction that are constructed and operated for purposes of water quality treatment, stormwater detention, and flood control, and that are used for the collection of stormwater via constructed conveyances. ☐ Yes ☒ No
2. All wetlands and lakes, within the permittee's jurisdiction, that collect stormwater via constructed conveyances. ☐ Yes ☒ No

D. Answer **yes** or **no** to indicate whether you have completed the following information for each feature inventoried.

1. A unique identification (ID) number assigned by the permittee. ☐ Yes ☒ No
2. A geographic coordinate. ☐ Yes ☒ No
3. Type of feature (e.g., pond, wetland, or lake). This may be determined by using best professional judgment. ☐ Yes ☒ No

If you have answered **yes** to all above requirements, and you have already submitted the Pond Inventory Form to the MPCA, then you do not need to resubmit the inventory form below.

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

D.1., D.2., D.3: The City of Baxter will complete the provided MS4 Pond, Wetland, and Lake Inventory Form and submit to the MPCA within the first 12 months of extended coverage.

- E. Answer **yes** or **no** to indicate if you are attaching your pond, wetland and lake inventory to the MPCA ☐ Yes ☒ No on the form provided on the MPCA website at: <http://www.pca.state.mn.us/ms4>, according to the specifications of Permit (Part III.C.2.b.(1)-(3)). Attach with the following file naming convention: *MS4NameHere_inventory*.

If you answered **no**, the inventory form must be submitted to the MPCA MS4 Permit Program within 12 months of the date permit coverage is extended.

V. Minimum Control Measures (MCMs) (Part II.D.5)

A. MCM1: Public education and outreach

- The Permit requires that, within 12 months of the date permit coverage is extended, existing permittees revise their education and outreach program that focuses on illicit discharge recognition and reporting, as well as other specifically selected stormwater-related issue(s) of high priority to the permittee during this permit term. Describe your **current** educational program, including **any high-priority topics included**:

The City of Baxter administers their public education and outreach program through a variety of means. The six MCMs are addressed individually with the BMPs established under the existing MS4 permit requirements, which are described in the City of Baxter's current SWPPP. The means and methods that are described in these BMPs include published articles in the Baxter newsletter, a web page with links for stormwater-related items and public participation opportunities, informational handouts found at City Hall, stormwater-related literature distributed to developers, business owners, churches, schools, residents, etc., and internal staff training for municipal operations.

- List the categories of BMPs that address your public education and outreach program, including the distribution of educational materials and a program implementation plan. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the U.S. Environmental Protection Agency's (EPA) *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>).

If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Distribute articles in Baxter newsletter informing public of the impact of stormwater.	Include at least one article for each MCM over the term of the permit.
Maintain a website with stormwater educational information.	Post at least one article for each MCM each year.
Informational handouts available at City Hall	Continually available for public visiting City Hall.
BMP categories to be implemented	Measurable goals and timeframes
Additional stormwater topics	The topics covered in the current education program will be expanded to include, at a minimum, illicit discharge recognition and reporting and high priority topics as determined during the permit term. High priority topics will surface through local news outlets and become a part of the City's focus on stormwater education.
Record-keeping procedures	Create a process for documenting annual details of educational program in the first 12 months of the new permit. Details should include any specific issues identified, any modifications, activities held with dates, and quantities and descriptions of materials distributed (including dates).

- Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Trevor Walter - Public Works Director/City Engineer

B. MCM2: Public participation and involvement

- The Permit (Part III.D.2.a.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement a public participation/involvement program to solicit public input on the SWPPP. Describe your current program:

The City of Baxter follows all public meeting notice requirements for announcements. The City holds an annual public meeting before the annual report is written where citizens are encouraged to provide input on the SWPPP. A draft annual report is made available for public review prior to the meeting. The City reviews all comments and input from the public and incorporates any subsequent changes to the SWPPP into the annual report. The City has a variety of public participation opportunities for stormwater pollutant prevention and reduction including leaf drop sites, oil and antifreeze recycling sites, and illicit discharge reporting service.

- List the categories of BMPs that address your public participation/involvement program, including solicitation and documentation of public input on the SWPPP. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>). If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Solicit public input and opinion on the adequacy of the SWPPP.	Hold an annual public meeting before the annual report is written. Provide a draft annual report and encourage input from the public.
Sentenced to Serve clean ups (STS)	Ongoing availability – participation/enrollment numbers will be documented.
Leaf drop site	Ongoing availability to properly dispose of leaf piles. A sign-in sheet will track who utilizes the site.
Oil and antifreeze recycling site	Ongoing availability at multiple locations around town.

BMP categories to be implemented	Measurable goals and timeframes
Provide a link on the City website for public access to SWPPP documents, annual reports, and other supporting documentation describing the SWPPP.	Ongoing availability – categorize documents by type (eg., SWPPP procedures, annual reports, committee meeting minutes, records of SWPPP activities and events)
Coordination meeting	Annually hold a coordination meeting involving co-permittees, regulatory agencies, and interested stakeholders to discuss progress of the storm water management program and the next year's activities.

- Do you have a process for receiving and documenting citizen input? ☒ Yes ☐ No

If you answered **no** to the above permit requirement, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

- Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Trevor Walter - Public Works Director/City Engineer

C. MCM 3: Illicit discharge detection and elimination

- The Permit (Part III.D.3.) requires that, within 12 months of the date permit coverage is extended, existing permittees revise their current program as necessary, and continue to implement and enforce a program to detect and eliminate illicit discharges into the small MS4. Describe your current program:

The City of Baxter currently has a storm sewer system map completed beyond the requirements of the existing MS4

permit and will continue updating to meet the requirements of the new MS4 permit. With the more recent implementation of a work order system, the City can use the two as an integrated way to report and track stormwater-related issues. The City also enforces an ordinance (Ordinance No. 2008-11) that prohibits non-stormwater discharges. There is an advertised dedicated phone number for reports of illicit discharges. Illicit discharge detection is done through outfall inspection. Representatives from the City staff attend the Public Works meeting which addresses stormwater-related issues.

2. Does your Illicit Discharge Detection and Elimination Program meet the following requirements, as found in the Permit (Part III.D.3.c.-g.)?
- a. Incorporation of illicit discharge detection into all inspection and maintenance activities conducted under the Permit (Part III.D.6.e.-f.) Where feasible, illicit discharge inspections shall be conducted during dry-weather conditions (e.g., periods of 72 or more hours of no precipitation). ☐ Yes ☒ No
 - b. Detecting and tracking the source of illicit discharges using visual inspections. The permittee may also include use of mobile cameras, collecting and analyzing water samples, and/or other detailed procedures that may be effective investigative tools. ☒ Yes ☐ No
 - c. Training of all field staff, in accordance with the requirements of the Permit (Part III.D.6.g.(2)), in illicit discharge recognition (including conditions which could cause illicit discharges), and reporting illicit discharges for further investigation. ☐ Yes ☒ No
 - d. Identification of priority areas likely to have illicit discharges, including at a minimum, evaluating land use associated with business/industrial activities, areas where illicit discharges have been identified in the past, and areas with storage of large quantities of significant materials that could result in an illicit discharge. ☐ Yes ☒ No
 - e. Procedures for the timely response to known, suspected, and reported illicit discharges. ☐ Yes ☒ No
 - f. Procedures for investigating, locating, and eliminating the source of illicit discharges. ☐ Yes ☒ No
 - g. Procedures for responding to spills, including emergency response procedures to prevent spills from entering the small MS4. The procedures shall also include the immediate notification of the Minnesota Department of Public Safety Duty Officer, if the source of the illicit discharge is a spill or leak as defined in Minn. Stat. § 115.061. ☐ Yes ☒ No
 - h. When the source of the illicit discharge is found, the permittee shall use the ERPs required by the Permit (Part III.B.) to eliminate the illicit discharge and require any needed corrective action(s). ☐ Yes ☒ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

C.2.a, C.2.c: The City will implement annual illicit discharge recognition and response training in the first 12 months. The training will cover procedures for illicit discharge detection that will be incorporated into all inspection and maintenance activities.

C.2.d: The City will review its inspection history and evaluate land use and zoning districts/allowable usage to identify priority areas.

C.2.e: An illicit discharge reporting phone number remains available, and the City will develop a process for timely responses to the reports. A complaint response flow chart will assist in directing the concern to the proper department.

C.2.f., C.2.g., C.2.h: Enforcement Response Procedures will be written and used in the event of known, suspected, and reported illicit discharges to ensure timely response, proper investigation, locating, and eliminating of the source, and to prevent spills from entering the MS4.

3. List the categories of BMPs that address your illicit discharge, detection and elimination program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdcs/pubs/measurablegoals.pdf>).

If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Storm sewer system map	City developed a map with all storm sewer infrastructure and continues updating it to satisfy permit requirements and to include new structures.
Illicit discharges prohibited by ordinance	The City implemented Ordinance No. 2008-11 section 8-5-11 prohibiting illicit discharges.
Inform the public and city staff about illicit discharges.	Information on illicit discharges is distributed in conjunction with the newsletters and website posts from MCM1.

Illicit discharge detection and elimination	A dedicated phone number is always available for illicit discharge concerns/reports by the public. At least 20% of the City outfalls are inspected each year – all outfalls at least once during the time of the permit. Sanitary system smoke testing is done once every 5 years.
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BMP categories to be implemented	Measurable goals and timeframes
Dry weather video inspection	Annual inspections (of 20% of City outfalls) revealing suspicious discharges will be inspected with video recording equipment (pipe televising) to identify entry points of pollutants to the storm sewer system.
Identifying priority areas	Create a process (within 12 months) for reviewing inspection history and land use to identify a list of priority areas that will need increased attention during the permit time.
Enforcement Response Procedures	Write Enforcement Response Procedures (ERPs) to be used for known, suspected, and reported illicit discharges or spills within the first 12 months of the new permit.
Standard Operating Procedures (SOPs)	Procedures for illicit discharge detection will be incorporated into all maintenance and inspection activities. The SOPs will be developed and implemented in the first 12 months of extended coverage.

4. Do you have procedures for record-keeping within your Illicit Discharge Detection and Elimination (IDDE) program as specified within the Permit (Part III.D.3.h.)? ☒ Yes ☐ No

If you answered **no**, indicate how you will develop procedures for record-keeping of your Illicit Discharge, Detection and Elimination Program, within 12 months of the date permit coverage is extended:

5. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Trevor Walter - Public Works Director/City Engineer

D. MCM 4: Construction site stormwater runoff control

1. The Permit (Part III.D.4) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement and enforce a construction site stormwater runoff control program. Describe your current program:

The City of Baxter requires that all owners, prior to engaging in any land disturbing activity, apply for, and obtain a Grading Permit from the City. Along with the permit application there must be a SWPPP that contains, at a minimum, the items required by the MPCA General Construction permit. The City reviews and approves the Grading Permit application and SWPPP and the Construction Stormwater Permit, if required, is issued by the MPCA. If the application meets the requirements, then a permit is issued for a specified period of time authorizing land disturbance activity contingent on the implementation of the BMPs shown on the plan. The City's designated representative regularly inspects the site to ensure that erosion and sediment control measures are properly installed and maintained.

2. Does your program address the following BMPs for construction stormwater erosion and sediment control as required in the Permit (Part III.D.4.b.):
- Have you established written procedures for site plan reviews that you conduct prior to the start of construction activity? ☐ Yes ☒ No
 - Does the site plan review procedure include notification to owners and operators proposing construction activity that they need to apply for and obtain coverage under the MPCA's general permit to *Discharge Stormwater Associated with Construction Activity No. MN R100001*? ☐ Yes ☒ No
 - Does your program include written procedures for receipt and consideration of reports of noncompliance or other stormwater related information on construction activity submitted by the public to the permittee? ☐ Yes ☒ No
 - Have you included written procedures for the following aspects of site inspections to determine compliance with your regulatory mechanism(s):
 - Does your program include procedures for identifying priority sites for inspection? ☐ Yes ☒ No
 - Does your program identify a frequency at which you will conduct construction site inspections? ☐ Yes ☒ No
 - Does your program identify the names of individual(s) or position titles of those responsible for ☐ Yes ☒ No

conducting construction site inspections?

- 4) Does your program include a checklist or other written means to document construction site inspections when determining compliance? ☐ Yes ☒ No
- e. Does your program document and retain construction project name, location, total acreage to be disturbed, and owner/operator information? ☐ Yes ☒ No
- f. Does your program document stormwater-related comments and/or supporting information used to determine project approval or denial? ☐ Yes ☒ No
- g. Does your program retain construction site inspection checklists or other written materials used to document site inspections? ☐ Yes ☒ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met.

D.2.a., D.2.b.: The City of Baxter does review site plans that are a part of the owner's SWPPP for construction activity but does not have a written procedure. The City will develop and implement a Site Plan Review checklist in the first 12 months of extended coverage. The current site plan review process does notify the owner of the need to apply for, and obtain coverage under the MPCA's general permit.

D.2.c.: The City receives and considers reports of noncompliance or other stormwater related information submitted by the public but does not yet have a written procedure. A complaint response flow chart will be developed and implemented in the first 3 months and will be used to direct the concern to the appropriate department.

D.2.d., D.2.e., D.2.f., D.2.g.: The City currently has no written procedures for site inspections to determine compliance or for documentation and retention of site specific information. A procedure will be developed and implemented that utilizes a construction site file for each active Grading Permit. Each issued Grading Permit will initiate a project folder and the folder will keep all documents associated with that project. The documents will include, at a minimum:

- Completed Priority Site Identification and Inspection Frequency Evaluation form
- Completed Site Description form
- Completed Site Inspection checklists
- Documented stormwater-related comments and/or supporting information used to determine project approval or denial

3. List the categories of BMPs that address your construction site stormwater runoff control program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>). **If you have more than five categories**, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
City of Baxter Ordinance No. 2008-11	Stormwater Control And Regulations Ordinance. All construction projects are subject to the terms of this ordinance.
Grading Permit	An abbreviated Grading Permit is required for projects not subject to the MPCA Construction Stormwater Permit.
SWPPP w/Fact Sheet	A list of items required in a Grading Permit application. The list is given to all owners of construction activity to assist them in preparing their application and SWPPP.
Construction Site Inspections	City building inspector observes site compliance during each building review site visit. Frequency of inspections varies by type of construction. Site inspection checklist will be created and implemented into future inspections.
BMP categories to be implemented	Measurable goals and timeframes
Update Grading Permit	Grading Permit application and process will be updated to include a description of the Site Plan Review process in the first 12 months.
Site Plan Review Checklist	Grading Permit will be updated with the Site Plan Review Checklist that will be followed during the City's review of the application and SWPPP. This will be done within the first 12 months of the new permit.
Standard Operating Procedures (SOPs)	SOPs will be developed and implemented for the inspection of construction sites within the first 12 months of extended

coverage.

4. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Trevor Walter - Public Works Director/City Engineer

E. MCM 5: Post-construction stormwater management

1. The Permit (Part III.D.5.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement and enforce a post-construction stormwater management program. Describe your current program:

The City of Baxter has a post-construction stormwater management program included in its stormwater regulations ordinance. The ordinance addresses final The utilization of

2. Have you established written procedures for site plan reviews that you will conduct prior to the start of construction activity? ☐ Yes ☒ No
3. Answer **yes** or **no** to indicate whether you have the following listed procedures for documentation of post-construction stormwater management according to the specifications of Permit (Part III.D.5.c.):
- a. Any supporting documentation that you use to determine compliance with the Permit (Part III.D.5.a), including the project name, location, owner and operator of the construction activity, any checklists used for conducting site plan reviews, and any calculations used to determine compliance? ☒ Yes ☐ No
- b. All supporting documentation associated with mitigation projects that you authorize? ☒ Yes ☐ No
- c. Payments received and used in accordance with Permit (Part III.D.5.a.(4)(f))? ☒ Yes ☐ No
- d. All legal mechanisms drafted in accordance with the Permit (Part III.D.5.a.(5)), including date(s) of the agreement(s) and names of all responsible parties involved? ☒ Yes ☐ No

If you answered **no** to any of the above permit requirements, describe the steps that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met.

E.2: The City's Grading Permit Application contains a list of requirements the owner of the land disturbing activity must meet. This list can be updated and translated to a checklist to be filled out during the site plan review process.

4. List the categories of BMPs that address your post-construction stormwater management program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>). If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
City of Baxter Ordinance No. 2008-11	Stormwater Control And Regulations Ordinance. All construction projects are subject to the terms of this ordinance.

BMP categories to be implemented	Measurable goals and timeframes
Update ordinance	The City's ordinance will be updated to include the post-construction requirements for no net increase in total stormwater runoff, total suspended solids, and total phosphorus. Mitigation provisions will be added as needed as well as provisions for establishing long term maintenance agreements during the development process. This will be done in the first 12 months of extended coverage.
Modify development agreement language	The owner of construction activity is required to enter into a development agreement with the City. The agreement will be modified in the first 12 months of coverage to include the

	establishment of long term maintenance plans.

5. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Trevor Walter - Public Works Director/City Engineer

F. MCM 6: Pollution prevention/good housekeeping for municipal operations

1. The Permit (Part III.D.6.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement an operations and maintenance program that prevents or reduces the discharge of pollutants from the permittee owned/operated facilities and operations to the small MS4. Describe your current program:

2. Do you have a facilities inventory as outlined in the Permit (Part III.D.6.a.)? ☒ Yes ☐ No

3. If you answered **no** to the above permit requirement in question 2, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

4. List the categories of BMPs that address your pollution prevention/good housekeeping for municipal operations program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. For an explanation of measurable goals, refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>).

If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Annual staff training	City staff reps attend weekly public works meeting which addresses stormwater-related issues. Employee training to prevent and reduce pollution from maintenance activities is held annually.
Street sweeping	All streets are swept at least once per year in spring and more as weather/budget permits. Priority areas are swept as needed. Mileage of streets swept and volume of material collected is monitored.
Inspection of structural BMPs	Inspect all City owned/operated structural BMPs twice per year.
Annual inspection of 20% of all structures	Inspect at least 20% of City owned/operated structures.
Annual inspection of stockpiles	Inspect all material stockpile, storage, and handling areas annually.
Work order program	Tickets are submitted for work to be done. Data is stored to track maintenance history and identify priority areas.
BMP categories to be implemented	Measurable goals and timeframes
Update MS4 facilities inventory	Continually update inventory to include all City owned/operated facilities that contribute stormwater discharges each year.
BMPs for inventoried facilities	BMPs for inventoried facilities will be developed and incorporated into internal staff training to educate staff on illicit discharge prevention and reduction during municipal operations. These BMPs will be in the form of Standard Operating Procedures.
BMPs for MS4 discharges that may affect Source Water Protection areas	BMPs will be developed for discharges that may affect Source Water Protection areas in the first 12 months of extended coverage.

Pond assessment procedures and schedule	A pond assessment procedure for determining effectiveness will be developed in the first 12 months. A long-term schedule for future assessments will be drafted as well.
Eliminate stockpiles	All stockpiles will be eliminated or consolidated within the first 12 months of extended coverage. Those that remain will be inspected quarterly as required by the new permit.
Training Program	An internal staff training program will be developed with a schedule for initial training for new employees and recurring training for existing employees to cover changes to the program. This training program will be developed in the first 12 months of extended coverage.
Documentation procedures	Documentation of inspections, maintenance, and training will be completed throughout the term of the permit. Record-keeping of all required information by the new permit will begin immediately.

5. Does discharge from your MS4 affect a Source Water Protection Area (Permit Part III.D.6.c.)? ☒ Yes ☐ No
- a. If **no**, continue to 6.
- b. If **yes**, the Minnesota Department of Health (MDH) is in the process of mapping the following items. Maps are available at <http://www.health.state.mn.us/divs/eh/water/swp/maps/index.htm>. Is a map including the following items available for your MS4:
- 1) Wells and source waters for drinking water supply management areas identified as vulnerable under Minn. R. 4720.5205, 4720.5210, and 4720.5330? ☒ Yes ☐ No
- 2) Source water protection areas for surface intakes identified in the source water assessments conducted by or for the Minnesota Department of Health under the federal Safe Drinking Water Act, U.S.C. §§ 300j – 13? ☐ Yes ☒ No
- c. Have you developed and implemented BMPs to protect any of the above drinking water sources? ☐ Yes ☒ No
6. Have you developed procedures and a schedule for the purpose of determining the TSS and TP treatment effectiveness of all permittee owned/operated ponds constructed and used for the collection and treatment of stormwater, according to the Permit (Part III.D.6.d.)? ☐ Yes ☒ No
7. Do you have inspection procedures that meet the requirements of the Permit (Part III.D.6.e.(1)-(3)) for structural stormwater BMPs, ponds and outfalls, and stockpile, storage and material handling areas? ☐ Yes ☒ No
8. Have you developed and implemented a stormwater management training program commensurate with each employee's job duties that:
- a. Addresses the importance of protecting water quality? ☐ Yes ☒ No
- b. Covers the requirements of the permit relevant to the duties of the employee? ☐ Yes ☒ No
- c. Includes a schedule that establishes initial training for new and/or seasonal employees and recurring training intervals for existing employees to address changes in procedures, practices, techniques, or requirements? ☐ Yes ☒ No
9. Do you keep documentation of inspections, maintenance, and training as required by the Permit (Part III.D.6.h.(1)-(5))? ☐ Yes ☒ No

If you answered **no** to any of the above permit requirements listed in **Questions 5 – 9**, then describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

F.6: The City of Baxter will develop procedures and a schedule to determine the TSS and TP treatment effectiveness in its owned/operated ponds in the first 12 months of extended coverage. The schedule may exceed the permit term and will be based on measureable goals and priorities of the City.

F.7: The City has been inspecting 20% of its structural stormwater BMPs annually and will continue to do so. Additionally, all City owned/operated ponds and outfalls (excluding underground outfalls) will be inspected at least once before the expiration date of this permit. The once-annual inspections of all stockpiles, and material storage and handling areas will be increased to once quarterly in the first 3 months of extended coverage.

F.8: The City will develop and implement an employee training program encompassing all maintenance operation BMPs, inspections, documentation, and stormwater pollutant management items relating to their job duties. The

program will include initial training for new/seasonal employees and recurring training intervals for existing employees to address changes in procedures, practices, techniques, or requirements.

F.9: The City will begin using various forms to be completed through inspections, maintenance, and training operations that will serve to document all associated information. This documentation will be stored and will be available for future reference. The forms will be created and implemented in the first 12 months of extended coverage.

10. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Trevor Walter - Public Works Director/City Engineer

VI. Compliance Schedule for an Approved Total Maximum Daily Load (TMDL) with an Applicable Waste Load Allocation (WLA) (Part II.D.6.)

- A. Do you have an approved TMDL with a Waste Load Allocation (WLA) prior to the effective date of the Permit? ☐ Yes ☒ No

1. If **no**, continue to section VII.
2. If **yes**, fill out and attach the MS4 Permit TMDL Attachment Spreadsheet with the following naming convention: *MS4NameHere_TMDL*.

This form is found on the MPCA MS4 website: <http://www.pca.state.mn.us/ms4>.

VII. Alum or Ferric Chloride Phosphorus Treatment Systems (Part II.D.7.)

- A. Do you own and/or operate any Alum or Ferric Chloride Phosphorus Treatment Systems which are regulated by this Permit (Part III.F.)? ☐ Yes ☒ No

1. If **no**, this section requires no further information.
2. If **yes**, you own and/or operate an Alum or Ferric Chloride Phosphorus Treatment System within your small MS4, then you must submit the Alum or Ferric Chloride Phosphorus Treatment Systems Form supplement to this document, with the following naming convention: *MS4NameHere_TreatmentSystem*.

This form is found on the MPCA MS4 website: <http://www.pca.state.mn.us/ms4>.

VIII. Add any Additional Comments to Describe Your Program